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March 23, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
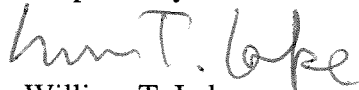445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Notice in IB Docket No. 02-364

Dear Ms. Dortch:

On March 22, 2005, the undersigned, Counsel to Globalstar LLC, Anthony J. Navarra, Globalstar's President, and William F. Adler, Globalstar's Vice President-Legal & Regulatory Affairs met with Sam Feder, Legal Advisor on Spectrum and International Issues to Chairman Kevin J. Martin. The subjects discussed at the meeting included Globalstar's pending petition for reconsideration in IB Docket No. 02-364. The handouts used during the meeting to summarize Globalstar's arguments in that proceeding are attached to this letter.

Pursuant to Sections 1.49(f) and 1.1206(b) of the Commission's rules, a copy of this letter and its attachments have been filed electronically.

Respectfully Submitted,

William T. Lake
Counsel to Globalstar LLC

Cc: Sam Feder
       William F. Adler

Globalstar Cannot Grow and Prosper without Sufficient Spectrum

- L-band Report and Order requires Globalstar and Iridium to share the segment 1618.25-1621.35 MHz
    - Iridium is still not using this spectrum
    - Iridium has declined to initiate a coordination process
    - Globalstar's petition for reconsideration is pending
- L-band Further Notice is considering additional sharing from 1616-1618.25 MHz
    - Iridium is not using the spectrum that it already has
    - No record evidence in the docket justified sharing 1618.25-1618.35 MHz, much less further sharing

Globalstar

Globalstar Cannot Grow and Prosper without Sufficient Spectrum

- Globalstar's February 2005 measurements show that Iridium is using about 1.4% of its system capacity over the U.S.

- Globalstar is using the CDMA segment of L-band as efficiently as possible

- Globalstar cannot grow its business if its access to CDMA spectrum is further compromised
  - Four to five channels for standard voice and data
  - Two channels for aviation
  - Two channels for commercially acceptable simplex telemetry service
  - One channel for ATC

Globalstar